21st Century Radio Ventures, Inc. 530 Wilshire Boulevard, Suite 301 Santa Monica, CA 90401

Tel: (310) 393-2741 Fax: (310) 393-4802 RECEIVED

JUL 0 8 1996

FCC MAIL ROOM

July 5, 1996

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

re: Littlefield, Wolfforth and Tahoka, Texas, MM Docket 95-83, RM 8634

Please find enclosed an original and four copies of Petitioner's "Supplemental Comments" in the above referenced proceeding, as requested by the Commission by its "Request For Supplemental Information" (released May 17, 1996).

Please return the copy marked "Stamp and Return" in the enclosed postage paid envelope.

Please contact the undersigned if you have any questions.

James L. Primm

Very truly yours

cc: Reg Hopkinson

100 to Copies roots 044

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

JUL 0 8 1996 FCC MAIL ROOM

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 95-83
Table of Allotments,)	RM-8634
FM Broadcast Stations)	
(Littlefield, Wolfforth and)	
Tahoka, Texas))	

SUPPLEMENTAL COMMENTS OF 21st CENTURY RADIO VENTURES, INC.

21st Century Radio Ventures, Inc. ("Petitioner"), permittee of KAIQ(FM), Littlefield, Texas hereby respectfully submits these Supplemental Comments in the above-captioned Rule Making. In support hereof Petitioner hereby submits the following:

I. INTRODUCTION

Petitioner filed a Petition for Rule Making in the above captioned proceeding for the purpose of allotting Channel 238C3 at Wolfforth, Texas, to provide that community with its first local service, and deleting Channel 238C3 at Littlefield, Texas and deleting vacant allotment 237A at Tahoka, Texas. The Commission sent out a Notice of Proposed Rule Making in the above referenced proceeding. Petitioner filed timely comments during the comment period. Comments were also filed by Lee W. Shubert, Trustee, licensee of KLLL(FM), Lubbock ("KLLL"), and by Emil Macha. In addition, on August 24,

1995, Albert Benavides submitted an application for a construction permit for FM Channel 237A at Tahoka Texas. Petitioner now files these Supplemental Comments in response to the FCC's "Request for Supplemental Information" released May 17, 1996.

II. The Predicted 70dBu signal for KAIQ at Wolfforth, TX Will Encompass Only 45.4% of the Lubbock Urbanized Area and therefore the Showing Required Under <u>Headland</u>, <u>Alabama</u> Is Not Required In This Case

In <u>Headland</u>, <u>Alabama and Chattahoochee</u>, <u>Florida</u>, 10 FCC Rcd 10352 (1995), the Commission set forth its rules with respect to moves of stations to areas which are proximate to, but not within, urbanized areas. In <u>Headland</u>, <u>Alabama</u>, the Commission held that "we will henceforth require station seeking to move from rural communities to suburban communities located outside but proximate to Urbanized Areas to make the same showing we currently require of stations seeking to move into Urbanized Areas <u>if they would place a city-grade</u> (70 dBu) signal over 50% or more of the <u>Urbanized Area</u>" 10 FCC Rcd at 10354 (emphasis added). As a result, stations that do not place a 70 dBu signal over at least 50% of the urbanized area are not required to make the <u>Headland</u>, <u>Alabama</u> showing.

As shown in the attached engineering statement of duTreil, Lundin & Rackley (see Exhibit 1) the 70 dBu contour of KAIQ FM, based on maximum Class C3 facilities and assuming uniform terrain in all directions, will reach only 45.4% of the Lubbock Urbanized Area. KAIQ should therefore not be subject to the requirements of <u>Headland, Alabama</u> and a showing of the factors of <u>Faye & Exhibit 1</u>

Richard Tuck should not be mandated in this case.

Although not required under the ruling in <u>Headland</u>, Alabama, Petitioner is pleased to provide evidence of the independence of Wolfforth from Lubbock as requested by the Commission in this proceeding. Summarized below are our findings in this case.

III. Wolfforth is Deserving of a First Local Service Preference Using the Commission's Three Factors Enumerated in RKO General and Faye and Richard Tuck.

The Commission has requested that Petitioner submit evidence sufficient to show that Wolfforth is deserving of a first local service preference using the Commission's three factors enumerated in RKO General, Inc., 5FCC Rcd 3222 (1990) and Faye and Richard Tuck, 3FCC Rcd 5374 (1988). In RKO and Faye and Richard Tuck the Commission clarified the type of evidence to consider in determining whether a proposal to serve a suburban community should be considered as a first local service or whether the suburban community should be credited with all of the services licensed in the urbanized area. There are three primary criteria: First, signal population coverage is examined. This refers to the degree of coverage to which the station could provide service not only to the suburban community but to the adjacent metropolis as well. Second, the size of the suburban community is compared to the size of the metropolis and whether

the suburban community is within or outside but proximate to the Urbanized Area of the central city. Third, the Commission reviews eight factors to determine the degree of interdependence between the two communities. <u>Headland Alabama</u>, 10 FCC Rcd 10352, 10355 (1995); RKO, 5 FCC Rcd at 3223.

As demonstrated below, although Wolfforth is located near a larger community, it is a separate and independent community richly deserving its first local radio service. Indeed, public policy demands that towns such as Wolfforth be provided their own independent media outlets so that they can maintain their independence from larger neighbors for reliance on news, community events, local retail sales and emergency information in the event of manmade or natural disasters.

A. Factor 1 -- Signal Population Coverage.

As noted in the attached engineering statement, only 45.4% of the Lubbock Urbanized Area will be reached by the 70 dBu signal of KAIQ. This tends to indicate that the station will not primarily be serving the urbanized area, focusing instead upon Wolfforth.

B. Factor 2 -- Size and Proximity of Wolfforth to Lubbock.

Wolfforth is a sizeable rural community with 1,941 people (1990 census). Its present population is estimated to be 2,400. Lubbock contains approximately 186,206 people (1990 census). The incorporated City of Wolfforth is located approximately eight kilometers outside of the city limits of Lubbock, separated by open rural area and farm land. Wolfforth is also located

outside of the urbanized area by approximately eight kilometers.

C. Factor 3 -- Interdependence of Wolfforth on Lubbock.

As discussed below, Wolfforth is independent in virtually every way from Lubbock. Many residents both live and work in Wolfforth, whose phone book lists over one hundred individual businesses within the city itself. Fifty-nine of these Wolfforth businesses are registered with Dunn & Bradstreet. Wolfforth maintains its own elected mayor and city council. It has its own city financed police department and a fifteen-member volunteer fire department. The city provides water and sewer services to the residents of Wolfforth. A new municipal building has recently been completed, which houses the city administrative offices, the police department and city library. There are five churches located within Wolfforth.

1. Many Residents of Wolfforth Both Live and Work in the Community

In discussions with local residents and the Wolfforth Chamber of Commerce Petitioner determined that there are over 100 businesses, both large and small, located in Wolfforth most all of which employ local residents. As a result, it appears that many residents of Wolfforth both live and work in the community.

2. Local Media in Wolfforth

There is very little local media in this sizable town, indicating the need for a local radio station to provide local news and community event information. In

addition, severe weather is not uncommon in the area and a media outlet is needed to provide up-to-the- minute emergency information for Wolfforth.

3. Community Leaders View Wolfforth as Independent From Lubbock

The attached letter from Mayor Rick McWhorter to the Federal

Communications Commission (Exhibit 2) indicates the strong feeling that people
in Wolfforth have for their community. Mayor McWhorter states unequivocally
that "In my opinion, which I believe is shared by both Wolfforth and Lubbock
residents, Wolfforth is a separate community, independent in virtually every way
from Lubbock."

4. Wolfforth Has Its Own Local Government and Elected Officials.

Wolfforth has its own local government which is completely separate and apart from Lubbock. A list of local elected officials is attached as Exhibit 3. The Wolfforth City Council consists of five members. The officials are elected at large. The mayor appoints a City Administrator.

5. Wolfforth Has Its Own Zip Code and Has Its Own Section in the GTE Phone Book That Does Not Include a Lubbock Section.

Wolfforth has been assigned its own zip code which is 79382. This zip code is not shared by any portion of Lubbock. Wolfforth also has its own Post Office, which, according the Wolfforth Community Fact Sheet, has "Recently moved into a large new building featuring the most modern concepts in postal facilities."

The telephone directory serves as further evidence of Wolfforth's independence from Lubbock. Wolfforth is serviced by GTE. The telephone directory includes a separate section for Wolfforth. While including separate sections on several other cities, the directory in which Wolfforth is located does not even include a section for Lubbock. A copy of the telephone directory cover and Wolfforth section of the directory is attached as Exhibit 4.

6. Wolfforth Has Many Active Commercial Establishments

Wolfforth has a thriving business community. A list provided by the Wolfforth Chamber of Commerce is attached as Exhibit 5. The telephone book reveals over one hundred businesses in Wolfforth. Exhibit 6 lists major employers, their product or service, and the number of employees. Wolfforth industries include the Frenship Independent School District, located in the heart of Wolfforth, employing 543 with an enrollment of 4,000 students, and the American Bank of Commerce with 128 employees, as well as a large retail grocery, a child care center, and farm equipment, meat packing, and welding businesses. This further supports the fact that Wolfforth is a growing, thriving community which does not need to rely on its larger neighbor for most services.

7. Wolfforth Is A Separate Advertising Market

Because of the dearth of advertising outlets available in Wolfforth, one of the only advertising vehicles is the phone directory. The GTE directory clearly separates the Wolfforth and Lubbock advertising markets, as evidenced by the fact that they are in separate telephone books.

8. Wolfforth Does Not Rely on Lubbock for Virtually Any Public Services; Wolfforth Has A Separate Taxing Authority

Wolfforth has its own municipally funded police department with four full-time personnel. It has a volunteer fire department made up of 15 volunteers. As noted above, Wolfforth has its own independent school district with 4,000 students attending schools located in Wolfforth and 543 employees. A new city library has recently been completed.

The City of Wolfforth provides water and sewer services. Electricity, gas and telephone are supplied by major regional carriers.

A list of City Services provided by Wolfforth and their budgets is attached hereto as Exhibit 7.

The City of Wolfforth is near completion of a new City Park. Upon completion, the park will contain a 4-field baseball complex, a lake stocked for fishing, a walking and jogging path, sheltered picnic areas, 2 basketball courts, a sand volleyball court, and a playground area.

Wolfforth assesses local taxes which are collected by the County

Appraisal District. These include a 0.58% City Tax, a 0.142% school tax, and a
.0084% water tax. City tax categories include Inventory, Machinery-Equipment,
and Retail Sales taxes.

D. Applying the Factors of RKO and Tuck Leads To The Conclusion That Petitioner's Request Should Be Considered A First Local Service.

Wolfforth is clearly independent from Lubbock. As stated in <u>Faye and</u>
Richard Tuck, the size and proximity of the specified community to the central

city and signal population coverage is pertinent, but has less significance than interdependence. 3 FCC Rcd at 5374; Headland, Alabama, 10 FCC Rcd at 5374; Headland, Alabama, 10 FCC Rcd at 10374; Headland, Alabama, 10 FCC Rcd at 10374; Headland, Alabama, 10 FCC Rcd at 10374; Headland, Headland, 10 FCC Rcd at 10374; Headland, Headland, 10 FCC Rcd at 10374; Headland, Alabama, 10, 10 FCC Rcd at 10374; Headland, Alabama, 10, 10</

IV. Petitioner Restates and Confirms That It Will Apply For and Build Channel 238C3 if Granted.

Petitioner restates and reconfirms its intention to apply for Channel 238C3 if it is allotted and that it will promptly build the station should the allotment be granted.

V. Conclusion.

Because only 45.4% of the Lubbock Urbanized Area will receive the 70 dBu signal of KAIQ, Petitioner should not be required to make the showing set forth in <u>Headland</u>, Alabama, which would require that Petitioner apply the factors set forth in <u>RKO</u> and <u>Faye and Richard Tuck</u>. If, as requested by the Commission, we apply the factors in <u>RKO</u> and <u>Faye and Richard Tuck</u>, Wolfforth is clearly independent from Lubbock and the instant request should be

considered a request for a first local service.

The statements in these Supplemental Reply Comments are true, complete and correct to the best of my knowledge and belief and are made in good faith.

Respectfully submitted,

21st Century Radio Ventures, Inc.

Dated: 1996

James L. Primm

President and Counsel

21st Century Radio Ventures, Inc. 530 Wilshire Blvd., Suite 301 Santa Monica, CA 90401 310-393-2741

EXHIBIT 1

ENGINEERING STATEMENT OF DUTREIL, LUNDIN & RACKLEY

TECHNICAL STATEMENT
IN SUPPORT OF THE COMMENTS OF
21ST CENTURY RADIO VENTURES, INC.
IN MM DOCKET NO. 95-83

This technical narrative was prepared on behalf of 21st Century Radio Ventures, Inc. ("Petitioner") in support of Comments in MM Docket No. 95-83¹. MM Docket No. 95-83 was issued in response to a request by the Petitioner which proposed the reallotment of KAIQ(FM), channel 238C3 from Littlefield to Wolfforth, Texas and the modification of its construction permit accordingly. The purpose of this technical narrative is to demonstrate that the 70 dBu contour of the reallotted channel 238C3 operation will encompass 45.4% of the Lubbock Urbanized Area.

Figure 1 is a map developed using the 1990 U.S. Census Topologically Integrated Geographic Encoding and Referencing TIGER/Line™ files which depicts the 70 dBu contour for the proposed KAIQ channel 238C3 operation set forth in the Petition.³ The location of the 70 dBu contour is based on maximum Class C3 facilities (ERP 25 kW/HAAT 100 m) and it is presumed that the terrain is uniform in all directions. The city limits of Lubbock,

¹ RM-8634, adopted May 8, 1996, released May 17, 1996.

² Petitioner also proposed either the deletion or substitution of the vacant channel 237A allotment at Tahoka, Texas.

³ TIGER/Line™ files are geographic coordinate-based digital maps of the entire United States which permit extraction of 1990 census data for selected areas.

Page 2 Wolfforth, Texas

based on the 1990 U.S. Census, have been shaded for reference purposes.

Figure 2 is a copy of the Urbanized Area map for Lubbock obtained from Appendix G of the report "1990 Census of Population and Housing, Population and Housing Units Counts, Texas, 1990 CPH-2-45". The proposed KAIQ(FM) 70 dBu contour depicted on Figure 1 was transferred to Figure 2.

Figure 3 is copy from Table 23 (Population, Housing Units, and Land Area for Urbanized Areas) of the same Census report which provides a breakdown of the component parts of the Lubbock Urbanized Area. As shown on Figure 3, the Lubbock Urbanized Area contains a total of 281.8 square kilometers. The majority of the Lubbock Urbanized Area consists of all of the Lubbock city limits (269.9 square kilometers) along with additional small "urban fringe" areas (11.9 square kilometers). It has been determined that the proposed KAIQ(FM) 70 dBu contour encompasses 128.1 square kilometers within the Lubbock Urbanized Area, or 45.4% of the total area within the Lubbock Urbanized Area.

⁴ The area encompassed within the 70 dBu contour was determined by using mapping software which determines the intersection (or common area) between separate, overlapping regions of TIGER/Line data files.

Page 3 Wolfforth, Texas

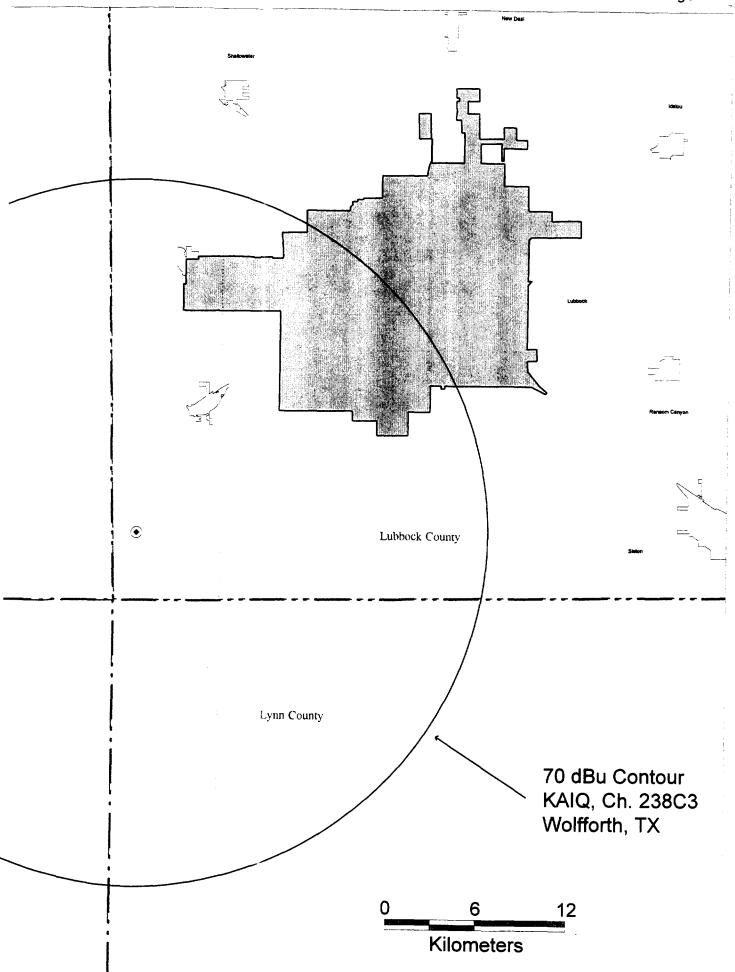
The attached technical statement has been prepared by or under the direct supervision of W. Jeffrey Reynolds, technical consultant with the firm of du Treil, Lundin and Rackley, Inc., a telecommunications consulting firm located in Sarasota, Florida, who states that his qualifications are a matter of record with the Federal Communications Commission, having been presented on previous occasions. All data and statements contained herein are true and correct to the best of his knowledge and belief.

W. Jeffrey Reynolds

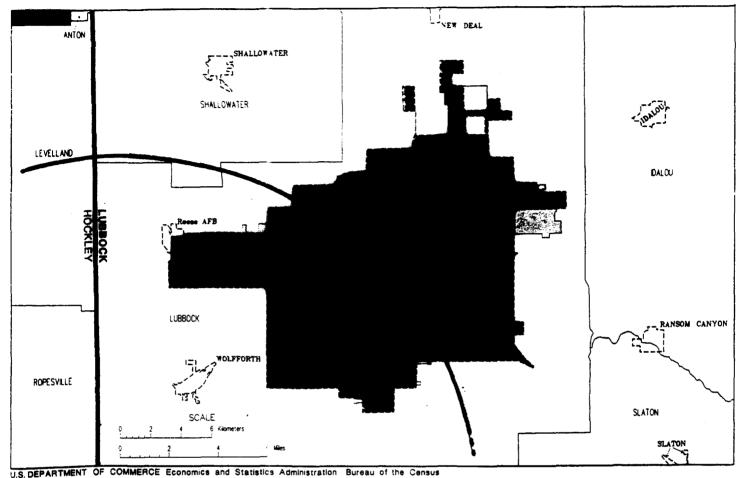
W. John Repudde

du Treil, Lundin & Rackley, Inc. 240 North Washington Blvd. Suite 700 Sarasota, Florida 34236 (941) 366-2611

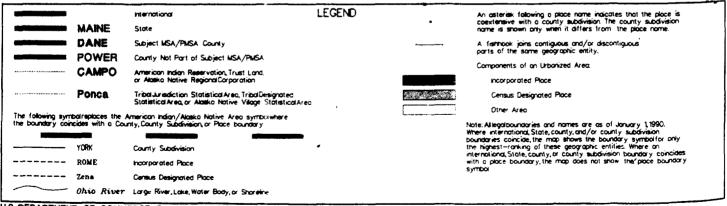
July 2, 1996



Urbanized Areas



TEXAS G-49 MAPS



U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

Table 23. Population, Housing Units, and Land Area for Urbanized Area: 1990—Con.

Density is computed using land area. For definitions of terms and meanings of symbols, see text

		į	Ared measurements				Density			
rbanized Area			Total area		Land area		Population pe	per — Housing units		per—
	Population	Housing units	Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mil
reviewille, TX — Con.	78 878	20.704	183.4	70.0	170.0	40.0	44) 2		171.7	448
nton County (pt.)†	/8 0/0	30 704	183.6	70.9	178.8	69.0	441.2	1 143.2	171. <u>7</u>	445.0
Corinth town (pt.) Justin-Roangke division (pt.)	2 154	815	14.2	5.5	14.2	5.5	151.7	391.6	57.4	148.:
Double Oak town (pt.)	2 150	013	14.1	5.5	_4 ·· <u>-</u> 14.1	5.5	152.5	-	57.7	147.
Flower Mound town (pt.) Lewisville division (pt.)	76 724	29 889	169.4	65.4	164.6	63.6	466.1	390.9 1 206.4	181.6	470.
Corinth town (pt.) Double Oak town (pt.)	3 944 1 660	1 385 511	20.1 5.6	7.7	20.0 5.6	7.7 2.1	197.2 296.4	512.2 790.5	69.3 91.3	179 243
Flower Mound town (pt)1	13 377	4 553	68.9	26.6	68.8	26.6	194.4	502.9	66.2	171
Hickory Creek town things and Village city the second	1 873 7 027	707 2 352	11.9 12.8	4.6 4.9	11.7 10.8	4.5 4.2	161.8 650.6	420.7 1 673.1	60.4 217.8	157 560
Loke Dullas city	3 656 44 944	1 559 18 724	6.7 41.7	2.6 16.1	5.8 41.6	2.2 16.0	630.3 1 080.4	1 661.8 2 809.0	268.8 450.1	706 1 170
rant County (pt.);	44 744	10 /24	41.7	10.1	41.0	10.0	1 000.4	2 607.0	430.1	,,
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Longview city†	70 311 70 311	30 293 30 293	135.7 135.7	52.4 52.4	135.5 135.5	52.3 52.3	518.9 518.9	1 344.4 1 344.4	223.6 223.6	579
kban fringe	6 118	2 284	27.0	10.4	26.9	10.4	227.4	588.3	84.9	21
gg County (pt.)}	74 773 1 6 38	31 904 628	155.1 10.1	59.9 3.9	154.7 10.1	59.7 3.9	483.3 162.2	1 252.5 420.0	206.2 62.2	53 16
White Oak city (pt.)	1 638	628	10.1	3.9	10.1	3.9	162.2	420.0	62.2	. 16
ngriew division (pt.) Longriew city (pt.) †	71 906 67 460	30 812 29 169	131.5 115.1	50.8 44.5	131.1 114.9	50.6 44.4	548.5 587.1	1 421.1 1 519.4	235.0 253.9	64
White Oak city (pt.) t	3 464 1 229	1 292	· 13.1	5.0	12.9	5.0	268.5	692.8	100.2	2:
ngview Northwest division (pt.)	i 195	464 451	13.4 13.0	5.2 5.0	13.4 13.0	5.2 5.0	91.7 91.9	236.3 239.0	34.6 34.7	ļ
White Oak city (pt.) †	34	13 \	.5	.2	.5	.2	68.0	170.0	26.0	6
rison County (pt.)†	1 656 1 656	673 673	7.6 7.6	2.9 2.9	7.6	2.9	217.9 217.9	571.0 571.0	88.6 . 88.6	23 23
Longview city (pt.)†	1 656	673	7.6	2.9	7.6 7.6	2.9 2.9	217.9	571.0	88.6	23
sbeck, TX				•						
ored	187 906 186 206	78 460 77 852	281.8	108.8	261.4	108.6	667.8 690.4	1 730.3	278.8	72
Lubbock city!	186 206	77 852 77 852	269.9 269.9	104.2 104.2	269.7 269.7	104.1 104.1	690.4 . 690.4	1 788.7 1 768.7	288.7 288.7	74
Irban tringe	1 700	608	11.9	4.6	11.7	4.5	145.3	377.8	52.0	13
bock County (pt.) †	187 906 187 906	78 460 78 440	261,8 261,8	108.8 108.8	281.4 261.4	108.6 108.6	667.8 667.8	1 730.3 1 730.3	278.8 278.8	7:
Lubbock city!	186 206	77 652	269.9	104.2	269.7	104.1	690.4	1 788.7	288.7	7.
Allen-Edisburg-Mission, TX										
orec	263 192 175 48 0	91 828	322.7	124.6	322.0	124.3	817.4	2 117.4	285.2	7.
Edinburg city t	29 865	59 492 9 206	197.8 36.7 84.2	76.4 14.2	197.4 36.6	76.2 14.1	889.0 816.5	2 302.9 2 119.5	301.4 251.5	71
McAllen city!	84 021 28 653	28 597 10 658	84.2 36.0	32.5 13.9	84.0 36.0	32.4 13.9	1 000.3 795.9	2 593.2 2 061.4	340.4 296.1	8 7
Phon city!	32 921	11 031	40.9	15.8	40.9	15.8	804.9	2 083.6	269.7	6
rban fringe	87 712	32 336	124.9	48.2	124.7	46,1	703.4	1 623.5	259.3	6
sigo County (pt.)†	263 192 36 526	91 828 11 263	322.7 52.8	124.6 20.4	322.0 52.7	124.3 20.3	617.4 693.1	2 117.4 1 799.3	285.2 213.7	7 5
disburg division (pt.) Edinburg city† Lopezville CDP (pt.)	29 865 984	9 206 271	36.7 1.8	14.2	36.6 1.8	14.1	816.5 546.7	2 119.5 1 405.7	251.5 150.6	8
McAlline city (pt.) t	2 694	975	8.1	3.1	8.1	3.1	332.6	869.0	120.4	3
McAllan Pherr division (pt.)	144 875 8 210	49 869 3 940	#157.3 7.1	60.7 2.8	157.0 7.1	60.6 2.8	922.6 1 156.3	2 390.7 2 932.1	317.6 554.9	8
Lonezville CDP (pt.)	1 843	469	1.0	.4	1.0	.4	1 843.0	4 607.5	469.0	1.1
Mission city (pt.)†	81 166	27 580	74,4 .5	28.7 .2	74.1	28.6 .2	1 095.7	2 638.7	372.2	9
Phorr city†	32 921 10 815	11 031 3 158	40.9 9.5	15.8 3.7	40.9 9.5	15.8 3.7	804.9 1 138.4	2 083.6 2 923.0	269.7 332.4	6
Mission division (pt.)	36 918	13 467	55.6	21.5	55.6	21.5	864.0	1 717.1	242.2	6
Abram-Perezville CDP (pt.)	852 1 403	387 369	3.4 3.3	1.3 1.3	3.4	1.3 1.3	250.6 425.2	655.4 1 079.2	113.8 111.8	2
McAllen city (pt.)	139	42	1.7	.7	1.7	.7	81.8	198.6	24.7	
Mission city (pt.)†	28 653 1 759	10 65 8 597	35.5 3.9	13.7 1,5	35.4 3.9	13.7 1.5	809.4 451.0	2 091.5 1 172.7	301.1 153.1	3

EXHIBIT 2

LETTER FROM MAYOR OF WOLFFORTH



CITY OF WOLFFORTH

PHONE 806/866-4215 POST OFFICE BOX 36 WOLFFORTH,TX,79362

Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Re: Amendment of Section 73.202 (b)

Table of Allotments, FM Broadcast Stations (Littlefield, Wolfforth and Tahoka, Texas)

MM Docket No. 95-83

Dear Sirs:

I am writing to express my complete support of the proposal of 21st Century Radio Ventures to bring a new FM radio station to Wolfforth, Texas. In my opinion, which I believe is shared by both Wolfforth and Lubbock residents, Wolfforth is a separate community, independent in virtually every way from Lubbock.

Our growing city of approximately 2400 residents is located outside of the city limits of Lubbock and is separated from Lubbock by agricultural land and suburban developments. We have our own elected mayor and council. We have our own city financed police department and the Wolfforth Volunteer Fire Department supplies emergency fire protection. Wolfforth EMS provides emergency medical services for our city. The City of Wolfforth provides water and sewer services.

We are very proud of our City. In the last year we have moved into a new municipal building. The building houses the municipal offices, police department, municipal court and the City Library. A new city park is near completion which includes a four-field baseball complex, basketball courts, a sand volleyball court, football and soccer areas, a lake stocked for fishing, and playground and picnic areas.

In short, Wolfforth is a great place to live, work and play. We look forward to the establishment of our first local radio station.

horter, Mayor

cc: James L. Primm, President

21st Century Radio Ventures, Inc.

EXHIBIT 3 LOCAL ELECTED OFFICIALS

Wolfforth Government Officials

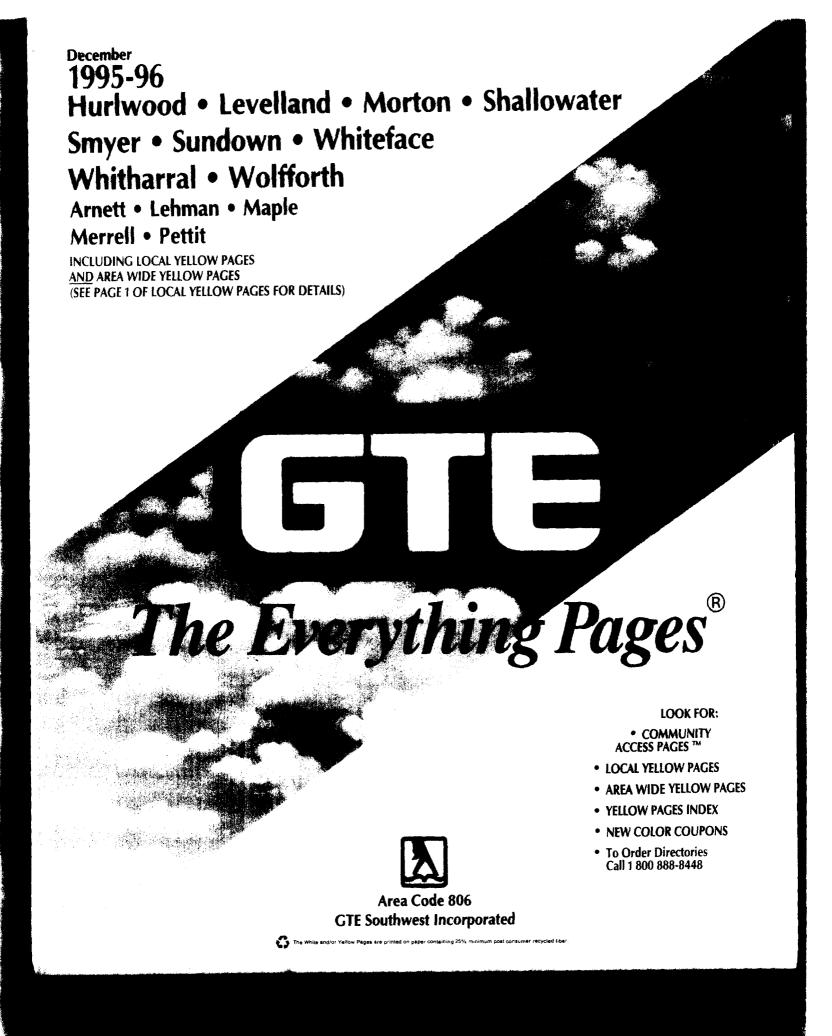
Mayor: Rich McWhorter

Councilmen: Bob Tate

Sylvia Preston Steve Jones L.C. Childers Bill Rogers

City Administrator: Frankie Pittman (appointed position)

EXHIBIT 4 WOLFFORTH GTE DIRECTORY



1270.58 270.58

Wolfforth

A	
A-1 Shoot Matel 7302 82nd St Wolfforth	866-9970
SERVICE INC 7302 82nd Lubbock	864_0555
ARA Survices: 385 Mein Welfforth Adam Grigh's David 1804 Bryan Av	344-530)
Administration 7th St. Administration of the St. Administration of the St. Administration Co. Booksy 1411 Bryan Av.	344-4389
Additional Charles E 23 Bennett Cr	365-4394
Aldinant D 9385 Viole Av	444
Alfred LK 822 8th St	06 A62
Albert Straigh 607 5th	767
Affact State States 7435 82nd Wolfforth	366-9173 366-4540
Alexandrial 7 3 14 E 18th Alexandrial Bert 408 - 8th Alexandrial 2016 405 - 3rd	866-4413
Aforma Bonny & Kocy 312 E 16th St	866-9401
For Business Only	911 266-9126
AMERICAN BANK OF COMMERCE AT	306-4281
AMERICAN BANK OF COMMERCE	793-2265 AT
American Studies Tank Co 7405 83rd	366-1018
Armshill 14 Durin Armshilany 9201 Dougen Av	366-9694
Armel Dang & Truess 723 6th St Wolfforth Armel Sahis W 424 Noin Armel Sahis W 413 4th	566-4370
Arrington Book 1604 Aberdeen Av	866-9636
Auto Service Center 8212 Valencia Av	866-999C
AvenProducts Inc To Free Bid 19 & Then Aprent Al. 808 an St. Appentionale 801 7th St	800858-8000
Ayers Tors W 19 Bennett Cir.	866-9873 866-4415
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BDPump Incompress Brownfield Hwy SFAute Sales 821 Hwy 62-82	866-4551
B & R MECHANICAL	866-2126
B&RPhyshing Seekkille 717-7th	866-4757
Bellay Bebert\$ 5 Bennett Cir	856-9382
Beliadehn 8304 98th	864-9629
Balter WW 602 -6th	866-4459
Benning JA 802 -0th	966-9352 846-2132
Berlandky Sleve 7316 94th St	866-2150 866-9619
Bedriffelt J 315 E 17th St	366-9416 366-4850
Pur Number	144-4473 144-9291
Religion D 607 8th St	066-9198 866-4419
Self Sen \$10 -8th	866-4653
Bed Fam. Bed Human & Beverly 320 E 15th St. Benneth J Wilden 807 - 7th Benneth J Wilden 807 - 7th Benneth J J You St. Benneth Light & Barbara 410 - 7th Benneth Light & Barbara 410 - 7th	866-9093 M6-4420
Semetiley 7917-96th.	866-4197 866-4450
Bondom Joe 402 4th St Wolfforth	RAA-GRES (

Bentley BK 9812 Barton Av	366-490
Bessent Territory 22 Circle Dr	866-846
Michael Arthur R 7321 93rd Welfforth	366-927.
Blackwillig J 724 8th St	966-939 966-414
Miss Construction & Electric 8212 Venta Av	966-411
Billing C 7319 93rd St Lubbook	365-440
Shippiditendell 9825 Hwy 62-82	866-478
Sides Side	
Stachstack Mourice 7929 96th St	866-438
Maker Ser 383 - 16th	
THE PART CASE AN WARRENCE	
Standard Judy 8903 116th St	
Blavins BJ	366-967
Bleemded 602 7th St.	
Besher CM 1906 Dowden Rd	866-433 !
Beens Wim 116 E 5th St Wolfforth	865-489
Bottoms Clack 511 -4th	966-440
Bouse Mitchele 304 E 18th St	
Sowers Mine 7918 98th St. Box Sensels 703 Indiana Wolforth	346-927
Ser Zee	
Begrif Culids Begrif Sparen 11 Donne Dr	25-157
Brady Statems 1206 Dausen Av	
Break Tomer 7926 96th	846-9357
Brandett James 12504 FM Rd 179	- 064-462
Branch Filmothy 718 Indians Av	
	- SE 127
Sittle Way Classers Lablock Hwy	
Bragge Miller 111 Loop 193	
Probat Gody	W-04
Breaks Cale Breaks Check 713 11th	
Breels David C 730 9th St	166-267
Brown Tim.	
Bress Jeseph F	864-4837
Bross Legnard Wolfforth	S64-454
Brook W. Brook James W 312 E 15th	266-4910
	164-1967
Buffrage Bylding Range 9506 Upland Av	866-2194
Burch Chas Co 8206 Venita Av	BEE-1971
BurkdE 403 -6th	
Burks Just J.	
Businets Courtney & Sarah 25 Bennett Wolfforth	No. 1424
Burnett-dim 25 Bernett Cr. Burnett-R.j. 22 Bernett Cr.	864-9691
Burrow Cameron	866-4700
Burrow Travis W 706 -6th	946-4662
Butcher's Choice Wholesele 8229 Valencia Wolfforth	866-988 5
Bybes Robert C	966-9825
Byers JT 714-8th	. 866-49 11
С	
CIMCO Inc	.844-952B
CombaliNA	. 866-493 7
Camp-dim News Rd. Camphelitte & Joyce	964-4960
Completed 806 9th St. Completed Lend Roy 1311 Sm Av.	864-9040
Carrier Conches recreated vehicles 7915 Brownfield Hwy	264-4274
Carolon AE 35 Bennett Cr	
Control R 719 12th St	866-2031
CANTRELL TOMMY MAIRM GAA	

Cassilla i 58 Courtney Lo	844-0904
Carnes Francis D 11631 Hwy 62-82	866-4687
Carrington Sensuel & Glanda Wolfforth	864-9315 864-9708
Carthel Mancy 1806 Aberdeen Av	866-9211
Cash Jerry Wayne 719 8th St.	966-9899
Castner D	864-2006
Catco Inc 10609 FM Rd 1585	. 866-4064
Champion Lee 9009 Canopa	866-4340
Champile 5 V	866-4830
Charles Soldy Courtney Ln	866-989/ 866-4880
Chievez Consent Construction 7406 B3rd	366-4787
ChinaR Down 308 E 20th Wolfforth	866-4650
Chirist Jamiller 304 E 16th	866-7335 866-4578
Paragage #03 -6th	. 864-4474
Circle A Stationful Service 7302 82nd	866-4499
Clark C 9204 Neove Av	866-9191
Chekkeneth E 715 11th St. Cheke Deers 7302 82nd St Wolfforth	. 866-970
Cheele Paint & Body 7903 C R 15	864-9614
Clay JD 12 Donna	866-2121 866-910
ClereKeren 810 6th St	866-910 866-931
Clinica John & Tine 7049 04th	944-4719
Coglamicary 301-19th Coggins Donald 611-6th	. 866-4951 . 866-4392
Color Bill	866-4881
Celte Geo 701 -7th	864-4451 864-4125
Cela Malen: 320 -19th	. 866-4322
Collins Corey 9006 Dawson Av	. 866-2081 . 866-9025
Collins Greg 9886 Dawson Av	264-403
	366-944
CorradWJ 11719 Hwy 62-82 Convey Robert H Hwy 179 S	
Cook Ainy	. 866-9 0 95
CockKelly & Rene 723 7th St	866-932
Carde Carlos 610 6th	864-9684
Cockledy & Rome 723 7th St. Cockleding 610 -8th. Cock Wilson.	
Cookston Ricky 820 9th St	. 866-4340
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Cochaton Ricity 820 9th St. Cociny J 727 6th St.	866-4340 866-9231 866-9675 866-3077
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Cochaten Ricky 820 9th St. Cockyd 727 6th St. Cockyd 727 6th St. Cocpar Garvis W. Cocpar Rines & Tracsy 702 7th St. Cocpar Staphes Warre. Cockyd Arnold 9212 Dawson Av. Cortex Bantos 905 - 5th. Contain Sans 1708 Aberdon Av.	866-4340 866-9231 866-9272 866-9965 866-9769 866-9769
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Cochaten Ricity 820 9th St. Coclay J 727 6th St. Coclay J 727 6th St. Cocper Garvis W. Cooper Staphan Wayne Corrier Santos 905 - 5th Cortex Santos 905 - 5th Coston Laste 1708 Aberdeen Av. Cotlan Teny 715 - 8th Cotlan Teny 715 - 8th Cotlan Teny 18 - 8th Cotlan Teny 18 - 8th Couling Bits 100 - 6th C	866-9237 866-9237 866-9237 866-9257 866-9257 866-9765 866-9765 866-4785 866-4785 866-4890 866-4520 866-9526
Conhaten Ricity 820 9th St. Cooling J 727 6th St. Cooling J 727 6th St. Cooper Blane & Tracky 702 7th St. Cooper Blane & Tracky 702 7th St. Cooper Shaphan Wayne Corles Santon Wayne Corles Santon 905 - 5th Contan Basine 1708 Aberdeen Av. Cotion Tary 715 - 8th Coston Basin 1008 Aberdeen Av. Cotion Tary 715 - 8th Couling Basin 100 - 6th Coulin	. 864-834 . 864-857 . 864-857 . 864-857 . 864-857 . 864-9767 . 864-9787 . 864-9752 . 864-9752 . 864-482 . 864-482 . 864-852 . 864-852 . 864-852 . 864-854 . 864-854 . 864-854 . 864-854 . 864-854 . 864-854
Cochaten Ricity 820 9th St. Cochay 3 727 6th St. Cochay 3 727 6th St. Cochay 4 727 6th St. Cocpar Bhas Tracey 702 7th St. Cocpar Shaphan Wayne. Cochar Carlos Santon Av. Cochar Carlos Santon 915 - 5th Cochar Carlos Santon 915 - 5th Cochar Carlos 1912 Dawson Av. Cochar Carlos 1913 Aberden Av. Cochar Carlos 1914 Aberden Av. Cochar Carlos 1914 The Cochar Carlos 1914 Cochar Carlos 1914 Cochar Carlos 1915 Aberden Av. Craft Teal 7311 2914 St. Craft Teal 7311 2914 St. Craft Teal 7311 2914 St.	864-931 864-923 864-923 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925 864-925
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Cochesten Ricity 820 9th St. Cociny J 727 6th St. Cociny J 727 6th St. Cocpar Sinch Mayore Coches St. Cocpar Sinch Mayore Coches St. Cocpar Sinch Mayore Cordeva Armed 9212 Dawson Av. Cortes Santon 905 - 5th Contes Santon 905 - 6th Cotton Santon 905 - 6th Couling Santon 905 - 6th Co	. 864-834 . 864-923 . 864-923 . 864-927 . 864-927 . 864-926 . 864-927 . 864-927 . 864-923 . 864-923 . 864-834 . 864-834 . 864-836 . 864-846 . 864-846
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